

SULLIVAN & CROMWELL LLP

TELEPHONE: 1-212-558-4000
FACSIMILE: 1-212-558-3588
WWW.SULLCROM.COM

125 Broad Street
New York, NY 10004-2498

LOS ANGELES • PALO ALTO • WASHINGTON, D.C.

FRANKFURT • LONDON • PARIS

BEIJING • HONG KONG • TOKYO

MELBOURNE • SYDNEY

Via ECF

March 11, 2015

Hon. Denise L. Cote,
United States District Judge,
500 Pearl Street, Room 1610,
New York, NY 10007-1312.

Re: FHFA v. Nomura Holding America, Inc., No. 11-cv-6201 (S.D.N.Y.)

Dear Judge Cote:

I write on behalf of defendants regarding proposed redactions to two letters filed today regarding evidentiary issues. Approximately 12 exhibits have been designated as “Confidential” or “Highly Confidential” under the First Amended Protective Order, dated January 11, 2013, and defendants therefore filed these materials under seal, pursuant to Paragraph 9 of that Order.

In order to give plaintiff the opportunity to review the documents, defendants respectfully request that the parties be given (a) until March 24, 2015 to meet and confer regarding proposed redactions, and (b) until March 31, 2015 to file a joint submission listing the agreed-upon redactions, as well as any redactions to which a party objects. Plaintiff consents to this proposed schedule.

Respectfully submitted,

/s/ David B. Tulchin

David B. Tulchin

Cc: All counsel of record